Wabash Communications
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EX PARTE LETTER

August 17, 2021

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Regarding: WC Docket No. 17-97: Call Authentication Trust Anchor

Dear Ms. Dortch:

I am writing to discuss obstacles to participation in the STIR/SHAKEN call authentication framework and to propose actions the Commission should take to remove these barriers.

Wabash uses telephone network equipment that is IP capable. We have implemented a STIR/SHAKEN solution. However, our use of STIR/SHAKEN is limited, because we cannot get IP interconnections with the PSTN for all our calls without building prohibitively expensive transport to IP interconnections at distant meet points.

Other voice service providers have filed comments and notices with the Commission to describe a similar problem. For example, Brightlink wrote, "Although our network is 100% IP, we are forced to exchange many calls with multiple TDM interconnects to the PSTN. In these cases, IP is not an option."[1]

New Lisbon Telephone Company faces the same obstacle. "Our network has been end-to-end SIP enabled for many years and we are ready to comply with the TRACED Act immediately. Unfortunately, we are excluded from the benefits of SHAKEN since we have no practical options for interconnecting with the Public Switched Telephone Network using SIP technology."[2]

Likewise, NTCA–The Rural Broadband Association stated that "IP interconnection for voice traffic is the principal industry-wide barrier to participation by all providers in the SHAKEN/STIR framework."[3]

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[1] *See* Brightlink letter to Marlene H. Dortch, May 15, 2020, at https://ecfsapi.fcc.gov/file/10515087024371/2020-05-15-Brightlink-ex-parte-final.pdf.
[2] *See* New Lisbon Telephone Company letter to Marlene H. Dortch, April 30, 2020, at https://ecfsapi.fcc.gov/file/104302421908769/2020-04-30_New_Lisbon%20Telephone_ex_parte_filing_final.pdf.
[3] *See* Ex parte notice, NTCA, September 21, 2020, at https://ecfsapi.fcc.gov/file/10921605615325/9.18.20%20WCB%20SHAKEN%20Order%20ex%20parte.pdf.

This is a twofold problem:

1. STIR/SHAKEN has relied upon an end-to-end IP network. There are non-IP SHAKEN extensions available to work around this limitation. The Commission has stated that it will wait until approved standards have been developed for non-IP call authentication, and software to implement non-IP call authentication is available on the commercial market, before reconsidering the "reasonable measures" requirement for non-IP call authentication.[4]
2. IP interconnections are not widely available to small, rural providers. To the extent they are, Wabash, and several hundred similarly-situated small service providers, would have to bear considerable expense to transport calls to distant IP meet points, costs these operators have never incurred before and which could threaten their continued ability to offer affordable voice service to rural consumers.

Fortunately, ATIS just recently announced approved standards that "extend call authentication to TDM networks in a way that ensures SHAKEN compatibility."[5] Developed by the ATIS Non-IP Call Authentication Task Force, the new standards and report are:

- Extending STIR/SHAKEN Over TDM (ATIS-1000095)[6]
- Signature-Based Handling of Asserted Information Using Tokens (SHAKEN): Out-of-Band PASSporT Transmission Involving TDM Networks (ATIS-1000096)[7]
- Technical Report on Alternatives for Caller Authentication for Non-IP Traffic (ATIS-1000097)[8]

Wabash has been using Out-of-Band technology to authenticate calls on live PSTN traffic for over a year and has successfully authenticated more than 1,868,414 calls in rural southern Illinois.

The approved standards are now available. Out-of-Band SHAKEN software is also commercially available today.

The STIR/SHAKEN system used by Wabash supports Out-of-Band SHAKEN as described in ATIS-1000096, and it works very well. It did not require changes either to our network or interconnection with other networks. It operates reliably at a substantially

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[4] *See* Second Report and Order on WC Docket 17-97 In the Matter of Call Authentication Anchor, paragraph 32, at https://docs.fcc.gov/public/attachments/FCC-20-136A1.pdf.
[5] *See* ATIS Addresses Non-IP Call Authentication, August 12, 2021, at https://www.atis.org/press-releases/atis-addresses-non-ip-call-authentication/.
[6] *See* Extending STIR/SHAKEN Over TDM (ATIS-1000095) at https://access.atis.org/apps/group_public/download.php/60331/ATIS-1000095.pdf.
[7] *See* Signature-Based Handling of Asserted Information Using Tokens (SHAKEN): Out-of-Band PASSporT Transmission Involving TDM Networks (ATIS-1000096) at https://access.atis.org/apps/group_public/download.php/60535/ATIS-1000096.pdf.
[8] *See* Technical Report on Alternatives for Caller Authentication for Non-IP Traffic (ATIS-1000097) at https://access.atis.org/apps/group_public/download.php/60536/ATIS-1000097.pdf.

less capital investment and recuring expense than the cost of carrying our calls to a distant IP interconnection.

We look forward to exchanging SHAKEN information with many more service providers, delivering the benefits of call authentication to our subscribers and the people and businesses they call.

The Commission should take actions to help make that possible for Wabash and many other service providers.

I encourage the Commission to take two actions that would enable Wabash Communications, and other voice service providers that face the SHAKEN participation barriers described above, to participate fully in the STIR/SHAKEN call authentication ecosystem.

1. Revisit the Commission's "reasonable measures" requirement for an effective non-IP caller ID authentication framework and shift it from focusing on development to focusing on the implementation of the new ATIS standards for non-IP call authentication.
2. Initiate a proceeding to examine ways the Commission can remove the IP interconnection barrier that small providers face.

Respectfully submitted,

/s/ Dave Frigen

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